

\* Filed in open court 6/14/07 (rw)

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Criminal Action No. 07-51 (GMS)
	)	
ROBERT ESCOBAR-SOLANO,	)	
	)	
Defendant.	)	

**MOTION FOR DETENTION HEARING**

**NOW COMES** the United States and moves for the pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because case involves

(check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☐ 10+ year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (**check one or both**):

  X   Defendant's appearance as required

  X   Safety of any other person and the community

3. **Rebuttable Presumption.** The United States (will / will not) invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because (**check one or both**):

       Probable cause to believe defendant committed 10+ year drug offense or  
firearms offense, 18 U.S.C. § 924(c)

       Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing.** The United States requests the court conduct the detention hearing,

       At first appearance

  X   After continuance of   3   days (not more than 3).

5. **Temporary Detention.** The United States request the temporary detention of the defendant for a period of        days (not more than 10) so that the appropriate officials can be notified since (**check 1 or 2, and 3**):

       1. At the time the offense was committed the defendant was:

       (a) on release pending trial for a felony;

\_\_\_ (b) on release pending imposition or execution of sentence,  
appeal of sentence or conviction, or completion of sentence  
for an offense;

\_\_\_ (c) on probation or parole for an offense.

\_\_\_ 2. The defendant is not a citizen of the U.S. or lawfully admitted for  
permanent residence.

\_\_\_ 3. The defendant may flee or pose a danger to any other person or the  
community.

6. **Other Matters.**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DATED this 14<sup>th</sup> day of June, 2007.

COLM F. CONNOLLY  
United States Attorney

By: 

Edmond Falgowski  
Assistant United States Attorney